

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY
MATTHEW D. BRINCKERHOFF
ANDREW G. CELLI, JR.
RICHARD D. EMERY
DEBRA L. GREENBERGER
DIANE L. HOUK
DANIEL J. KORNSTEIN
JULIA P. KUAN
HAL R. LIEBERMAN
ILANN M. MAAZEL
KATHERINE ROSENFELD
ZOE SALZMAN
SAM SHAPIRO
EARL S. WARD
O. ANDREW F. WILSON

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

MONDAIRE JONES
VASUDHA TALLA

ERIC ABRAMS
NICK BOURLAND
DANIEL M. EISENBERG
ARIADNE M. ELLSWORTH
SARA LUZ ESTELA
LAURA S. KOKOTAILO
SONYA LEVITOVA
SARAH MAC DOUGALL
SANA MAYAT
HARVEY PRAGER
VIVAKE PRASAD
MAX SELVER
EMILY K. WANGER

June 20, 2024

Via ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, New York 10007

Re: Turnbull v. JPMorgan Chase & Co., Index No. 1:21-cv-03217-JGK

Your Honor:

This firm represents Donald Turnbull. We write on behalf of both parties, and pursuant to the Court's direction (ECF No. 100), to provide an update regarding settlement efforts. The parties and Plaintiff's third-party funder have reached an agreement in principle. The parties and the third-party funder require additional time to finalize that agreement, which we expect will take an additional month. Upon execution of that agreement, this case will be dismissed with prejudice. Accordingly, the parties jointly request a continued stay of fact and expert discovery through July 19, 2024, at which point the parties will file a joint status report regarding the parties' ongoing discussions and, if necessary, a joint proposal regarding remaining discovery deadlines.

Respectfully submitted,

/s/

Eric Abrams

cc. All Counsel of Record